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[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

CITY OF STERLING HEIGHTS	)	No. 2:12-cv-05275-SDW-MCA
GENERAL EMPLOYEES'	)	
RETIREMENT SYSTEM, Individually	)	<u>CLASS ACTION</u>
and on Behalf of All Others Similarly	)	
Situated,	)	NOTICE OF LEAD PLAINTIFFS'
	)	MOTION TO COMPEL VERUS
Plaintiff,	)	FINANCIAL LLC TO PRODUCE
	)	SUBPOENAED DOCUMENTS
vs.	)	
	)	MOTION DATE: July 7, 2014
PRUDENTIAL FINANCIAL, INC., et	)	
al.,	)	
	)	
Defendants.	)	
_____	)	

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that on July 7, 2014, the undersigned attorneys for plaintiffs, will move before the United States District Court, District of New Jersey, Martin Luther King Courthouse, 50 Walnut Street, Newark, NJ 07101 for an order, pursuant to Local Civil Rule 37.1(a)(1), compelling third party Verus Financial LLC to search for and produce documents responsive to plaintiffs' Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action, dated March 12, 2014.

PLEASE TAKE FURTHER NOTICE that plaintiffs will rely upon the declaration of Shawn A. Williams in support of this application.

PLEASE TAKE FURTHER NOTICE that oral argument is not requested unless the matter is contested.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted herewith.

DATED: June 6, 2014

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/s/ Peter S. Pearlman  
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